

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MOUNTAIN EXPRESS OIL COMPANY, et al.,

Debtors.¹

Chapter 11

Case No. 23-90147 (DRJ)

(Jointly Administered)

Related Docket Nos. 117 and 247

AMENDED WITNESS AND EXHIBIT LIST

Mountain Express Oil Company and certain of its affiliates (collectively, the “Debtors”) hereby submits the following *Witness and Exhibit List* (the “Witness and Exhibit List”) with respect to the hearing scheduled on April 25, 2023 at 11:00 a.m. (CT), in the above-captioned bankruptcy cases (the “Cases”), pending before the Honorable David R. Jones, United States Bankruptcy Judge, Courtroom 400, 515 Rusk, Houston, Texas 77002.

WITNESS LIST

The Debtors may call the following witnesses:

1. Michael Healy, Chief Restructuring Officer.
2. Geoffrey Richards, Raymond James & Associates, Inc. (proposed Investment Banker)
3. Any witness listed, offered, or called by any other party.
4. Any witness required for rebuttal or impeachment.

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at www.kccllc.net/mountainexpressoil. The location of Debtor Mountain Express Oil Company’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 3650 Mansell Road, Suite 250, Alpharetta, GA 30022.

EXHIBIT LIST

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
1.	Senior Secured, Super-Priority Debtor-In-Possession Credit Agreement [Docket No. 117].				
2.	First Amendment to Senior Secured, Super-Priority Debtor-In-Possession Credit Agreement [Docket No. 317-1]				
3.	Updated DIP Budget [Docket No. 317-1]				
4.	Declaration Of Michael Healy In Support Of Debtors' Chapter 11 Petitions And First Day Relief [Docket No. 57].				
5.	Declaration Of Geoffrey Richards In Support Of Debtors' Emergency Motion For Entry Of Interim And Final Orders (I) Authorizing The Debtors To (A) Obtain Postpetition Financing And (B) Use Cash Collateral, (II) Granting Liens And Providing Superpriority Administrative Expense Claims, (III) Granting Adequate Protection To Prepetition Secured Parties, (IV) Modifying The Automatic Stay, (V) Scheduling A Final Hearing, And (VI) Granting Related Relief [Docket No. 106].				
6.	Declaration Of Michael Healy In Support Of Debtors' Emergency Motion For Entry Of Interim And Final Orders (I) Authorizing The Debtors To (A) Obtain Postpetition Financing And (B) Use Cash Collateral, (II) Granting Liens And Providing Superpriority Administrative Expense Claims, (III) Granting Adequate Protection To Prepetition Secured Parties, (IV) Modifying The Automatic Stay, (V) Scheduling A Final Hearing, And (VI) Granting Related Relief [Docket No. 107].				
7.	Declaration of Michael Healy in Support of Debtors' Emergency Motion for Entry of an Order (I) Authorizing and Approving a Non-Insider Key Employee Retention Plan and (II) Granting Related Relief [Docket No. 247].				

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
8.	Any exhibits listed, designated, or offered by any other party.				
9.	Any exhibits necessary for rebuttal.				
10.	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases and related adversary proceedings.				

The Debtors reserve the right to modify, amend or supplement this Witness and Exhibit List at any time. The Debtors reserve the right to ask the Court to take judicial notice of pleadings, orders, transcripts and/or documents filed in or in connection with these Cases, to offer rebuttal exhibits, and to supplement or amend this Witness and Exhibit List at any time prior to the April 25, 2023 hearing. Designation of any exhibit above does not waive any objections the Debtors may have to any exhibit listed on any other party's exhibit list.

Dated: April 24, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Michael D. Warner

Michael D. Warner (TX Bar No. 00792304)
Steven W. Golden (TX Bar No. 24099681)
440 Louisiana Street, Suite 900
Houston, TX 77002
Telephone: (713) 691-9385
Facsimile: (713) 691-9407
mwarner@pszjlaw.com
sgolden@pszjlaw.com

-and-

Jeffrey N. Pomerantz (admitted *pro hac vice*)
Jeffrey W. Dulberg (admitted *pro hac vice*)
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
Telephone: (310) 277-6910
Facsimile: (310) 201-0760
jpomerantz@pszjlaw.com
jdulberg@pszjlaw.com

Proposed Counsel to the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of April, 2023, a true and correct copy of the above and foregoing has been served on all parties that are registered to receive electronic transmission through this Court's CM/ECF filing system in these cases.

/s/ Michael D. Warner

Michael D. Warner